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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

1. Ilsa Saravia, as next friend for A.H., a
2. minor, and on behalf of herself individually
3. and others similarly situated,

4. Plaintiff,

5. v.

6. William Barr, Attorney General, et al.,

7. Defendants.

8. Case No. 3:17-cv-03615-VC

9. Honorable Vince Chhabria

10. **[PROPOSED] ORDER SHORTENING
11 BRIEFING SCHEDULE AND SETTING
12 MOTION HEARING ON PLAINTIFF'S
13 MOTION FOR PRELIMINARY APPROVAL
14 OF CLASS SETTLEMENT**

1 WHEREAS, the Parties have reached a settlement in the above-captioned action;

2 WHEREAS, Plaintiff intends to file a Motion for Preliminary Approval of Class Settlement no
3 later than September 18, 2020;

4 WHEREAS, Defendants do not intend to oppose the Plaintiff's Motion for Preliminary
5 Approval;

6 WHEREAS, the parties agree that it would be most efficient to shorten the standard 35-day
7 briefing schedule per L-R 7-2 and for the Court to hold a preliminary approval hearing on
8 October 15, 2020;

9 WHEREAS, counsel for Plaintiff has an existing obligation scheduled for October 22, 2020,

10 NOW, THEREFORE, the parties respectfully request that the Court set the briefing schedule
11 and hearing date as follows:

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- 13 • September 18, 2020: Plaintiff to file Motion for Preliminary Approval of Class Settlement;
- 14 • September 25, 2020: Defendants to file Notice of Non-Opposition;
- 15 • October 15, 2020 (or as early as the Court allows): Preliminary Approval on Plaintiff's
16 Motion.

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1 Dated: September 17, 2020

COOLEY LLP

2 /s/ Martin S. Schenker

3 Martin S. Schenker
4 Ashley S. Corkery
Evan G. Slovak

5 American Civil Liberties Union Foundation of
Northern California
6 William S. Freeman
Sean Riordan

7 ACLU Foundation Immigrants' Rights Project
8 Stephen B. Kang

9 Law Offices of Holly S. Cooper
Holly Cooper

10 New York Civil Liberties Union Foundation
11 Christopher Dunn
Amy Belsher
12 Jessica Perry

13 *Attorneys for Plaintiff*

14

15 Dated: September 17, 2020

UNITED STATES DEPARTMENT OF JUSTICE

16 /s/ Nicole M. Murley

17 Nicole M. Murley
Sarah B. Fabian

18 *Attorneys for Defendants*

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ATTESTATION

I hereby attest that concurrence in the filing of this document has been obtained from the Signatory of this document, pursuant to L.R. 5-1(i)(3).

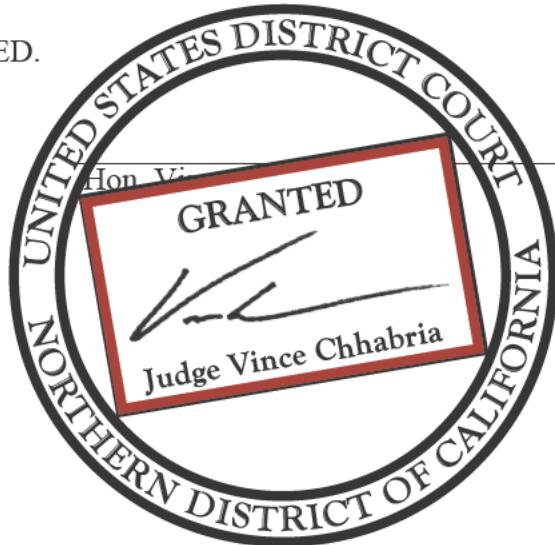
/s/ Martin S. Schenker

Martin S. Schenker

ORDER

1 PURSUANT TO STIPULATION, IT IS SO ORDERED.
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3 Dated: September 18, 2020



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